

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**This Document Relates to All Actions**

**ZHP DEFENDANTS' NOTICE OF SUPPLEMENTAL  
MOTION FOR SUMMARY JUDGMENT<sup>1</sup>**

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<sup>1</sup> This Supplemental Motion for Summary Judgment concerns the claims designated in the Court's Case Management Order No. 32 (the "TPP Trial Claims"), specifically, the claims of Plaintiff MSP Recovery Claims, Series LLC ("MSP"), as class representative of TPP Breach of Express Warranty subclass b, TPP Breach of Implied Warranty subclass d, TPP Fraud subclass c, and TPP State Consumer Protection Laws subclass a (collectively, the "TPP Classes"). (Doc. 2343, at 1-2.) Accordingly, this motion is limited to the TPP Trial Claims, and is presented without waiver of any arguments for summary judgment with respect to any other claims asserted by any Plaintiff as to any Defendants in this multi-district litigation.

**PLEASE TAKE NOTICE** that on February 5, 2024, Defendants Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai U.S., Inc.; Princeton Pharmaceutical Inc.; and Solco Healthcare U.S., LLC (collectively, the “ZHP Defendants”), by and through their undersigned counsel, shall move for the entry of an Order granting them summary judgment on Plaintiffs’ claims. This motion is made to the Hon. Robert B. Kugler, United States District Judge, pursuant to Rule 56(a) of the Federal Rules of Civil Procedure and the applicable local rules of this Court.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, the ZHP Defendants shall rely on the accompanying Memorandum of Law in Support of ZHP Defendants’ Supplemental Motion for Summary Judgment, the TPP Trial Defendants’ Omnibus Statement of Material Facts Not in Dispute, and the exhibits thereto.

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted herewith;

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested, if this motion is opposed; and

**PLEASE TAKE FURTHER NOTICE** that a Certificate of Service attesting to the date and manner of service is submitted herewith.

Dated: December 22, 2023

Respectfully submitted,

By: /s/ Jessica Davidson  
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Inc., Princeton Pharmaceutical Inc., and  
Solco Healthcare U.S., LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 22, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson  
Jessica Davidson